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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Manuel Bandres Oto and Elisa Lopez-
Belio, individually, and on behalf of all
eligible beneficiaries of claims arising
from the wrongful death of Marina
Bandres Lopez-Belio, et al.

Case No. 2:16-cv-01027-DJH

Plaintiffs,

v.

Airline Training Center Arizona, Inc.,
Defendant.

**INDEX OF EXHIBITS TO DEFENDANT AIRLINE
TRAINING CENTER ARIZONA, INC.'S SEPARATE
STATEMENT OF FACTS IN SUPPORT OF MOTION
FOR SUMMARY JUDGMENT PURSUANT TO LRCiv.
56.1**

Exhibit A	A true and correct copy of a email letter from Bach Langheld Dallmayr counsel for Germanwings in Germany, to plaintiffs' counsel dated June 15, 2016
Exhibit B	A true and correct copy of an email stipulation from plaintiffs' counsel to ATCA's counsel dated June 15, 2016

Respectfully submitted,

CLYDE & CO US LLP

By: /s/ Christopher Carlsen

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Attorneys for Defendant Airline Training
Center Arizona, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2016, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

KREINDLER & KREINDLER LLP

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/s/ Christopher Carlsen

Exhibit A

Carlsen, Christopher

From: Alexander, Martin <martin.alexander@bld.de>
Sent: Wednesday, June 15, 2016 1:20 PM
To: info@dr-backes.de
Cc: BAlexander@kreindler.com; Carlsen, Christopher; 'Evert Wytema'; Elmar Giemulla; Jim.Morris@IrwinMitchell.com; kanzlei@mueller-coll.de; Mr M.T. Spetter (Maya); rebecca.smith@IrwinMitchell.com; AHabig@kreindler.com; KMahoney@kreindler.com; amhabig@kreindler.com; Büsken, Rainer
Subject: Re: Germanwings Flight 9525
Attachments: Decedents according to claim.pdf

Dear Mr. Wellens:

Further to Brian Alexander's letter to BLD dated February 2, 2016, we are aware that you and your collaborative counsel now have commenced litigation on behalf of various individuals against Airline Training Center Arizona, Inc. ("ATCA") in the United States District Court for the District of Arizona, in the case entitled *Manuel Bandres Oto, et al, v Airline Training Center Arizona, Inc.*, Case No. CV-16-01027-PHX-DJH (the "Oto Litigation"). We are writing to confirm that Germanwings has agreed not to contest liability for full compensatory damages recoverable under the applicable law with respect to the claims involving all of the decedent-passengers in the *Oto Litigation*.

As you are aware, the decedents involved in the *Oto Litigation* were not citizens or residents of the United States, and so it is our position that these damage claims are governed by the laws of jurisdictions other than the United States. The enclosed list sets forth the residence/citizenship of each of the decedents involved in the *Oto Litigation*. Moreover, because none of these decedents were United States citizens or residents, and Germanwings is not subject to jurisdiction in the United States, we believe it appropriate that any settlement discussions be conducted with you and/or your respective collaborating counsel in their home jurisdictions outside of the United States.

To avoid any potential confusion, we represent Germanwings and not ATCA, and it is only Germanwings that has agreed not to contest liability for these claims. In addition, nothing herein should be construed as a waiver or modification or any periods of limitation that may be applicable to your clients' claims.

Sincerely,
Rainer Büsken
Martin Alexander

Dr. Martin Alexander, LL.M.
Rechtsanwalt/Partner

BLD Bach Langheid Dallmayr
Rechtsanwälte Partnerschaftsgesellschaft mbB
Theodor-Heuss-Ring 13-15
D-50668 Köln
Fon: +49 221 944027-43
Fax: +49 221 944027-985
e-mail: martin.alexander@bld.de

Sitz der Partnerschaftsgesellschaft mbB ist Köln - Amtsgericht Essen PR 2237

The registered office of the Partnerschaft (limited liability partnership under German law) is in Cologne - local district court Essen PR 2237

Liste der Partner/list of partners: www.bld.de

Decedents

ID	DecLN	DecFN	Address at death	Marital Status	Gender	Citizenship	DOB
.001	Ayon Razo	Daniela	Mexico	Single	Female	Mexico	3/17/1979
.002	Bergjürgen	Linda	Reiherhorst 4a, 45721 Haltern am See	single	female	Germany	10/15/1999
.003	Bleß	Elena	Völklingen str.12, 45721 Haltern am See	single	female	Germany	3/25/1999
.004	Cercek	Sonja	Heisstr. 2, 48145 Münster	married	female	Germany	9/13/1979
.005	Drüppel	Lea	Kampweg 14, 45721 Haltern am See	single	female	Germany	4/23/1999
.006	Eils	Seiina	Im Baaken 6, 457231 Haltern am See	single	female	Germany	1/8/1999
.007	Gerdes	Gina	Am Treckeberg 30, 45721 Haltern am See	single	female	Germany	5/15/1999
.008	Gortmann	Dennie	Türkstraße 5, 30167 Hannover	single	male	Germany	4/4/1987
.009	Gottschall	Beatrix	Tippelsberger Str. 42, 44807 Bochum	married	female	Germany	8/3/1956
.010	Hahn	Ann-Christin	An den Hestern 10, 45721 Haltern am See	single	female	Germany	8/14/1998
.011	Hermann	Julia	Heideweg 16, 45721 Haltern am See	single	female	Germany	6/27/1999
.012	Höfer	Christopher	Elbbachstr. 3, 56459 Rothenbach	single	male	Germany	12/13/1986
.013							
.014	Klüh	Stefan	Julius-Haerlin-Str. 16, 82131 Gauting	married	male	Germany	1/13/1977
.015	Koch	Marleen	Eschweg 40, 45721 Haltern am See	single	female	Germany	3/15/1999
.016	Lehmann	Diana	Spichernstr. 28, 40476 Düsseldorf	single	female	Germany	6/9/1981
.017	Lütkenhaus	Paula	Auf dem Berge 1, 45721 Haltern am See	single	female	Germany	3/19/1999
.018	Oelrich	Andreas	Heiser Bruch 20, 32457 Porta Westfalica	married	male	Germany	7/23/1961
.019	Oelrich	Kerstin	Heiser Bruch 20, 32457 Porta Westfalica	married	female	Germany	9/14/1962
.020	Olthoff	Geert	Schulstr. 14, 49846 Hoogstede	single	male	Germany	8/17/1986
.021							
.022	Radner	Maria	Cronenfelder Str. 48, 42349 Wuppertal	Single	female	Germany	5/7/1981
.023	Rogge	Fabio	Kettelerstr. 25, 45721 Haltern am See	single	male	Germany	12/15/1998
.024	Sadlo	Kristina	Kalkweg 164 A, 47279 Duisburg	single	female	Germany	5/19/1991
.025	Scheiderer	Rabea	Augustusstr. 8a, 45721 Haltern am See	single	female	Germany	3/12/1999
.026	Schenk	Felix	Cronenfelder Str. 48, 42349 Wuppertal	single (child of .022 & .027)	male	Germany	9/12/2013
.027	Schenk	Sascha	Cronenfelder Str. 48, 42349 Wuppertal	single (engaged to .022)	male	Germany	8/29/1976
.028	Schukart	Lea	Im Tiefen Winkel 13, 45721 Haltern am See	single	female	Germany	10/9/1998
.029	Siebe	Helena	Am Paschenberg 13, 45271 Haltern am See	single	female	Germany	11/23/1998
.030	Stahl	Sebastian	Höhenstr. 6, 56459 Rothenbach	single	male	Germany	8/12/1990
.031	Strang	Steffen	Postweg 4, 45721 Haltern am See	single	male	Germany	11/3/1998
.032	Tegethoff	Stefanie	Flandernstr. 41, 48147 Münster	engaged	female	Germany	8/15/1981
.033	Venhoff	Aline	Weseler Str. 103, 45721 Haltern am See	single	female	Germany	1/16/1999
.034	Voß	Jens	Heyestr. 130, 40625 Düsseldorf	single	male	Germany	8/16/1977
.035	Westermann	Caja	Lambertusweg 13, 45721 Haltern am See	single	female	Germany	6/20/1999
.036	Bramley	Paul	U.K./Switzerland	single	male	U.K.	2/13/1956
.037	Bandres Lopez-Belio	Marina	Apt. 207, 5 Luna Street, M4 5LX Manchester	married	female	U.K.	12/26/1976
.038	Pracz-Bandres	Julian	Apt. 207, 5 Luna Street, M4 5LX Manchester	single	male	U.K.	8/27/2014
.039	Matthews	Martyn	21 Abbeyfield Road, WV 10 8 TH Wolverhampton	married	male	U.K.	6/13/1964
.040	Püntmann	Ann-Kathrin	Rebstock 14, 45239 Essen	single	female	Germany	8/20/1988
.041	Meyer	Barbara	In der Loh 38, 40668 Meerbusch	married to 042	female	Germany	7/24/1974
.042	Meyer	Stefan	In der Loh 38, 40668 Meerbusch	married to 041	male	Germany	8/24/1970
.043	Ludwig	Bettina	Altenbrückstr. 49, 40599 Düsseldorf	engaged to 049	Female	Germany	4/5/1974
.044	Diemer	Claudia	Scharpenberg 102, 45468 Mülheim an der Ruhr	Married to 052	Female	Germany	11/6/1964
.045	Bourgeois	Dietmar	Brunshollweg 9, 44369 Dortmund	Married to 046	Male	Germany	4/26/1948
.046	Bourgeois	Roswitha	Brunshollweg 9, 44369 Dortmund	Married to 045	Female	Germany	4/23/1950
.047	Oppenau	Dirk	C/ LLUCÀ, 42-46 45 2^ E-08028 Barcelona	Married	Male	Germany	9/17/1960
.048	Schonebeck	Erik	C/Camp 64, 4^ 2^ E-Barcelona	Single	Male	Germany	12/12/1972

Decedents

.049	Kraus	Heinz Peter	Hildebrandtstraße 3, 50739 Köln	engaged to 043	Male	Germany	11/30/1969
.050	Hülsmann	Jessica	Mittelfeldstraße 13, 46539 Dinslaken	single	Female	Germany	11/5/1976
.051	Noack	Juliane	Schirmerstraße 33, 04317 Leipzig	single	Female	Germany	11/20/1984
.052	Diemer	Jürgen	Scharpenberg 102, 45468 Mülheim an der Ruhr	Married to 044	Male	Germany	3/23/1959
.053	Schützler	Karin	Floridablanca 26, 08015 Barcelona	Married	Female	Germany	2/26/1953
.054	Soblik	Larissa	Adolfstraße 16, 56457 Westerbürg	Single	Female	Germany	4/18/1994
.055	Medrano Aragon	Luis Eduardo	Barrio Loma Linda 9N-01, Popayan-Colombia	Single	Male	Colombia	11/16/1978
.056	Koch	Lutz	Obere Lichtenplatzer Str. 264, 42287 Wuppertal	engaged to 068	Male	Germany	9/18/1966
.057	Korolczuk	Maik	Azaleenweg 9, 42289 Dortmund	Single	Male	Germany	1/13/1989
.058	Jockheck	Manfred	Auf dem Wodeacker 42, 44359 Dortmund	married to 066	Male	Germany	7/3/1949
.059	de Paplo Nuno	Maria	Jahnstraße 42, 40215 Düsseldorf	Married	Female	Spain	5/31/1977
.060	del Pilar Tejada	Maria	Carrer dels Tallers 82, Piso 3 Puerta 2, E-08001 Barcelona	Married	Female	Spain	9/2/1981
.061	Blendermann	Tim	Rheydtter Straße 236, 41065 Mönchengladbach	Single	Male	Germany	3/21/1989
.062	Tahrioui	Mohamed	Wanheimer Straße 213, 47053 Duisburg	married	Male	Morocco	1/14/1991
.063	Lohmann	Muradiye	Nöggerathweg 114, 40591 Düsseldorf	Single	female	Germany	1/30/1977
.064	Bryjak	Oleg	Neu-Breuning-Str. 21, 47877 Willich	Married	Male	Germany	10/27/1960
.065	Schmidt	Ralph	C/Mannleu 9, Urb. Can. Dalmases, 08293 Collbato (Barcelona)	Married	Male	Germany	12/21/1966
.066	Jockheck	Sabine	Auf dem Wodeacker 42, 44359 Dortmund	married to 058	Female	Germany	7/8/1968
.067							
.068	Schenk	Stefanie	Obere Lichtenplatzer Str. 264, 42287 Wuppertal	engaged to 056	Female	Germany	7/6/1967
.069	Fischenich	Sven	Feiningerweg 3, 50389 Wesseling	married	Male	Germany	11/15/1981
.070	Treppe	Thomas	Calle Fernando Pool6-22, 08005 Barcelona	married	Male	Germany	5/18/1956
.071	Claassen	Iris	Peelklamp 14, 5751 RC Deurne, Netherlands	Single	Female	Netherlands	8/12/1994
.072	Kohlstädt	Anke	Holtzenstraße 11 32457 Porta Westfalica	married	female	Germany	8/4/1965
.073	Kohlstädt	Michael	Holtzenstraße 11 32457 Porta Westfalica	married	male	Germany	4/9/1961
.074	Smailagic	Emira	Bleichgasse 4 41460 Wuppertal	married	female	Germany	10/23/1959
.075	Smailagic	Fe h ret	Bleichgasse 4 41460 Wuppertal	married	male	Germany	7/7/1957
.076	Sato	Junichi	Kanedecho 16-1, Suita-Shi Osaka- Fu Japan	married	male	Japan	42 years old
.077	Hülsmann	Klaus	Poststr. 65, 46562 Voerde	single	male	Germany	21.03.1948
.078	Bahners	Frank	Dominikaner Str. 31, 40545 Düsseldorf	single	male	Germany	05.02.1970
.079	Hojjatoleslami	Milad	Place of residence was Thehran, Iran	single	male	Iran	21.09.1984

Exhibit B

Carlsen, Christopher

From: Brian J. Alexander <BAlexander@kreindler.com>
Sent: Wednesday, June 15, 2016 3:39 PM
To: Carlsen, Christopher
Cc: Anne Condon Habig; Ivette Viera; Kevin J. Mahoney; Marc S. Moller; Alex M. Habig
Subject: RE: Germanwings [CC-US1.FID345523]

Chris

Pursuant to our discussion we are willing to stipulate as follows:


There were two passenger decedents on board Germanwings Flight 9525 who were citizens and residents of the United States, however none of the passenger decedents whose estates and/or beneficiaries are represented in the instant action were United States citizens.

Best regards,

Brian


Brian J. Alexander

Partner

 **KREINDLER & KREINDLER** ^{LLP}
TRADITION OF EXCELLENCE

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 Please consider the environment before printing this e-mail.

From: Carlsen, Christopher [<mailto:Christopher.Carlsen@clydeco.us>]
Sent: Wednesday, June 15, 2016 10:17 AM
To: Brian J. Alexander
Subject: RE: Germanwings

Any word on the stipulation that none of your decedents were U.S. residents/citizens?

Chris

Christopher Carlsen
Partner | Clyde & Co US LLP
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From: Carlsen, Christopher
Sent: Tuesday, June 14, 2016 11:55 AM
To: 'Brian J. Alexander'
Subject: RE: Germanwings

Ok, thanks

Christopher Carlsen
Partner | Clyde & Co US LLP